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Scott W. Brim, Reg. No. 51,500

Signature Date

Attorney Docket No. 8285/375

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:)	
)	
Dianna I. Tiliaks et al.)	
Serial No.: 09/741,734)	Examiner: Miller, Brandon J.
Filing Date: December 19, 2000)	Group Art Unit No.: 2617
For:)	
METHOD AND SYSTEM FOR)	
DUAL RINGING OF A CENTREX)	
LINE AND A WIRELESS)	
EXTENSION OF THE CENTREX)	
LINE)	

REPLY BRIEF

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Applicants submit this Reply Brief in response to the Examiner's Answer mailed November 5, 2008.

I. Status of Claims

Claims 1-22 are pending, stand rejected, and are the subject of this appeal.

II. Grounds of Rejections to Be Reviewed on Appeal

1. Claims 1-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No. 5,963,864 ("O'Neil") in view of U.S. Pat. No. 6,970,719 ("McConnell").

III. Argument

A. Applicants Maintain that the Proposed Combination of O'Neil and McConnell Do Not Render Claims 1 and 5 Unpatentable

Independent claims 1 and 5 recite a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line. O'Neil and McConnell both fail to teach this element.

In the Examiner's Answer, the Examiner asserts that Applicants have argued that the proposed combination of O'Neil and McConnell do not render claims 1 and 5 unpatentable because "*first*, O'Neil fails to teach initiating a call to a wireline number and initiating another call to a wireline extension of the wireless number; and *second*, McConnell does not teach dual ringing such that when a telephone call is placed to a Centrex line, a service node initiates a first call to a wireless extension of the Centrex line and a second call to the Centrex line." (See Examiner's Answer, page 12). Applicants submit that the Examiner has improperly characterized the Applicants' arguments. Applicants have consistently maintained that O'Neil and McConnell both fail to teach a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line, and that for at least this reason, the proposed combination of O'Neil and McConnell does not render independent claims 1 and 5, or any claims that depends on claims 1 or 5, unpatentable.

O'Neil is directed to a method and system for automatically connecting telephone calls to multiple devices having different directory numbers. In O'Neil, a subscriber may associate a telephone number of a wireless device with a telephone number of a wireline number so that when a call is placed to the wireline number, a first call may be initiated to the wireless device and a second call may be initiated to the wireline number. With respect to the O'Neil system, O'Neil fails to teach initiating a call to a wireline number and initiating another call to a wireless extension of the wireline number. In O'Neil, the telephone number of the wireless device is not a wireless extension of the wireline number, but is simply a separate telephone number of a wireless device that a user has associated with the wireline number. Further, the Examiner has admitted that O'Neil fails to teach a Centrex line. Thus, O'Neil

necessarily does not disclose a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line as recited in claims 1 and 5.

In the Examiner's Answer, the Examiner asserts that Applicants have argued with respect to O'Neil that claims 1 and 5 include the element "initiating a call to a wireline number and initiating another call to a wireless extension of the wireline number." (See Examiner's Answer, page 12). Applicants disagree and submit that the Examiner is mischaracterizing the Applicants' arguments. Applicants have consistently maintained that O'Neil fails to teach a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line as recited in claims 1 and 5.

Like O'Neil, McConnell also fails to teach a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line. McConnell is directed to a private wireless network integrated with a public wireless network. In McConnell, a mobile device may be used as a cellular phone when outside a private network wireless coverage, and be used as an extension of a Centrex line when within the private network wireless coverage. McConnell does not teach dual ringing such that when a telephone call is placed to a Centrex line, a service node initiates a first call to a wireless extension of the Centrex line and a second call to the Centrex line. In McConnell, a call is only initiated to the mobile device. Therefore, while McConnell may teach a mobile device that may act as an extension of a Centrex line, McConnell fails to teach a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line as recited in claims 1 and 5.

In the Examiner's Answer, the Examiner asserts that Applicants have argued with respect to McConnell that claims 1 and 5 include the element "dual ringing such that when a telephone call is placed to a Centrex line, a service node initiates a first call to a wireless extension of the Centrex line and a second call to the Centrex line." (See Examiner's Answer, page 13). Applicants disagree and submit that the Examiner is mischaracterizing the Applicants' arguments. Applicants have consistently maintained that McConnell fails to teach a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line as recited in claims 1 and 5.

Because O'Neil and McConnell both fail to teach at least a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line, Applicants maintain that the proposed combinations of O'Neil and McConnell necessarily do not render independent claims 1 and 5, or any claims that depends on claims 1 and 5, unpatentable.

B. The Proposed Combinations Do Not Render Claim 15 Unpatentable

Independent claim 15 recites a service node coupled with a service signal point, the service node operative to initiate a first call to a wireless extension of a Centrex line and a second call to the Centrex line in response to the wireless extension of the Centrex line being available. As discussed above, O'Neil and McConnell both fail to teach a service node initiating a first call to a wireless extension of a Centrex line and a second call to the Centrex line. For at least this reason, Applicants maintain that the proposed combinations of O'Neil and McConnell necessarily do not render independent claim 15, or any claim that depends on claim 15, unpatentable.

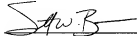
C. The Proposed Combinations Do Not Render Claim 18 Unpatentable

Independent claim 18 recites a network element that is separate from a switch initiating a call to a Centrex line and a call to wireless extension of the Centrex line. As discussed above, O'Neil and McConnell both fail to teach this element. For at least this reason, Applicants maintain that the proposed combinations of O'Neil and McConnell necessarily do not render independent claim 18, or any claim that depends on claim 18, unpatentable.

IV. Conclusion

For the reasons set forth above, Applicants respectfully submit that all of the pending claims are patentable over the applied references. Accordingly, Applicants respectfully request removal of the pending rejections.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "S.W. Brim", is written over a horizontal line.

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